

Exhibit 12



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY *Pink*

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829
PAT QUINN, GOVERNOR JOHN J. KIM, DIRECTOR

217/524 3300

March 19, 2014

Certified Mail
7012 0470 0001 3000 0221

OWNER/OPERATOR
Chicago Heights Land Management
17001 S. State Street
South Holland, IL 60473

Re: 0310455284 -- Cook County
Chicago Heights Land Management
Permit No. 2011-149 DE
Log No. 2013-587
Permit File

IEPA-DIVISION OF RECORDS MANAGEMENT
RELEASABLE

MAR 31 2014

REVIEWER: EMI

Dear Mr. Fox:

Permit is hereby granted to Chicago Heights Land Management as owner and operator, to develop a facility to receive, treat and transfer municipal waste as described below, at a facility consisting of 27.57 acres in the NW Quarter of Section 22, all in T35N, RME, 3rd Principal Meridian, also described as 1301 South State Street, Chicago Heights, Illinois 60411, all in accordance with the application prepared by Kevin Coughlin, P.E., of Conestoga-Rovers & Associates, signature dated April 14, 2011.

The facility consists of a transfer building with six unloading areas and the employee area, administrative and scalehouse building, landscaping, stormwater management system, and paved driveways and parking areas. Final plans, specifications, application, and supporting documents, as submitted and approved, shall constitute part of this permit and are identified in the records of the Illinois Environmental Protection Agency (Illinois EPA), Bureau of Land, Division of Land Pollution Control by the permit number and log number designated in the heading above.

Pursuant to Section 39(a) of Illinois Environmental Protection Act (Act) and 35 Ill. Adm. Code 807.201, this permit is issued subject to the development, operating and reporting requirements for non hazardous waste management facilities in 35 Ill. Adm. Code, Part 807, the standard conditions attached hereto and incorporated herein by reference, and further subject to the following special conditions. In case of conflict between the permit application and these conditions (both standard and special), the conditions of this permit shall govern.

4302 N. Main St., Rockford, IL 61103 (815) 987-7760
595 S. State, Elgin, IL 60123 (847) 608-3131
2123 S. First St., Champaign, IL 61820 (217) 278-5800
2009 Main St., Collinsville, IL 62234 (618) 346-5120

9511 Harrison St., Des Plaines, IL 60016 (847) 294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309) 693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618) 993-7200
100 W. Randolph, Suite 10-300, Chicago, IL 60601 (312) 614-6026

PLEASE PRINT ON RECYCLED PAPER

A. Development and Operation

1. This permit is for construction and development only. No waste may be received at the site until an operating permit is issued by the Illinois EPA, Bureau of Land, Permit Section. After completion of development, the permittee shall submit an application for an operating permit to the Illinois EPA containing all applicable construction test results and reports.

2. This permit allows for the construction and development of the units listed below:

Unit Designation	Approximate Size	Proposed Use
a. Tipping Area	285' long x 115' wide	storage of waste prior to processing
b. 2 feed lines with picking, grapples, flail bag openers and magnets	(5400 tons)	to remove unacceptable materials, to break open bags and boxes, and to recover ferrous material
c. Processing Lines (3)	46 tons per hr.	separation of waste into sizes
i) primary trommels (3)		removal of inert material
ii) shredders (3)		to remove aluminum cans
iii) magnets (14)		to remove ferrous material
iv) secondary trommels (2)		to remove unacceptable material for waste removal and recovery of recyclable materials
v) air classifiers (4)		
vi) cyclone separators (7)		
d. RDF Storage Area	2,500 tons (Room 5)	storage and compacting of RDF prior to transfer offsite
e. Rail Loadout Area	180' long x 75' wide	allows two rail cars to be top loaded with pre-compacted RDF
f. all corresponding sumps, pumps, conveyors, bag filters, loading and unloading areas and appurtenances		

3. This permit authorizes the development of a facility to receive and transfer an average of 2,700 tons per day of municipal solid waste (i.e., household, commercial and institutional waste). Once an operating permit is received, only non-hazardous solid wastes may be received, no potentially infectious medical waste, hazardous wastes, industrial process waste or special waste may be accepted at this facility. Industrial process waste does not

include uncontaminated corrugated cardboard, wooden crates and pallets, plastics (both packaging and rigid materials), office waste (primarily paper and plastic) and cafeteria waste.

4. The Permittee shall ensure site surface drainage during development, during operation, and after the site is closed shall be such that adjacent property owners encounter no adverse effects.
5. This permit is issued with the expressed understanding that no process discharge to Waters of the State or to a sanitary sewer will occur from these facilities, except as authorized by a permit from the Bureau of Water.
6. The Permittee shall notify the Illinois EPA of any changes from the information submitted to the Illinois EPA in its application for a Development and Operating permit for this site. The Permittee shall notify the Illinois EPA of any changes in the names or addresses of both beneficial and legal titleholders to the herein permitted site. Such notification shall be made in writing within fifteen (15) days of such change and shall include the name or names of any parties in interest and the address of their place of abode; or, if a corporation, the name and address of its registered agent.
7. After an operating permit is issued the facility may receive waste at the site from 5:00 a.m. to 9:00 p.m. Monday through Saturday. Prior to issuance of an operating permit no waste may be received at the facility.
8. Fire safety equipment (fire suppression and fire extinguishers) shall be maintained in accordance with recommended practice.
9. The best available technology (mufflers, berms and other sound shielding devices) shall be employed to minimize equipment noise impacts on property adjacent to the site during both development, operation and during any applicable post-closure care period.
10. A vector control specialist shall inspect the transfer station building at least quarterly. If necessary, vector control measures shall be taken.
11. The operator shall ensure that at least once during every 24 hour period, all waste shall be removed from the tipping floor, Pile Area No. 1 and Compacted Pile 2 to allow for cleaning. These floors shall be swept once every 24 hours to remove all waste.
12. The Permittee shall ensure that all incoming and outgoing vehicles hauling waste shall be covered or closed to contain waste and prevent its escape onto public roadways. Facility personnel shall conduct a daily facility inspection, collect litter, and properly manage the accumulated waste.
13. The Permittee shall control odors and suppress dust created by facility activities and waste hauling to prevent off-site migration. If the facility receives a complaint, the Permittee shall notify the Des Plaines Regional Office. If the introduction of masking

agents through a portable system is not adequate to prevent the detection of odors that occur off-site as a result of the municipal solid waste, the Permittee must submit an application to modify the permit as necessary to control odors.

14. If the Permittee observes unacceptable waste during delivery to the facility during unloading, the Permittee shall reject the waste in accordance with the procedures in Application Log No. 2011-149.
15. Management of Unauthorized Waste by the Permittee
 - a. Lead acid batteries mixed with municipal waste will be removed the same day and transported either to a drop off center handling such waste, or to a lead acid battery retailer.
 - b. Hazardous waste and potentially infectious medical waste mixed with municipal waste shall be containerized separately and removed as soon as possible by a licensed special waste hauler. Special wastes shall be transported to a licensed special waste management facility that has obtained authorization to accept such waste utilizing the Illinois EPA's special waste hauling and manifest system. The Permittee shall maintain a contract with haulers so that the immediate removal is ensured. The Permittee shall develop an emergency response/action plan for such occurrences.
 - c. Asbestos debris from construction demolition shall be managed in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAPS) regulations.
 - d. Tires found to be mixed with municipal waste shall be removed and managed in accordance with Section 55 of the Act [415 ILCS 5/55].
 - e. White good components mixed with municipal waste shall be removed and managed in accordance with Section 22.28 of the Act [415 ILCS 5/22.28].
 - f. No person may knowingly mix liquid used oil with any municipal waste that is intended for collection and disposal at a landfill in accordance with Section 21.6 of the Act [415 ILCS 5/21.6].
 - g. After the unauthorized waste has been removed from the transfer station, a thorough cleanup of the affected area will be made according to the type of unauthorized waste managed. Records shall be kept for three years and will be made available to the Illinois EPA BOL upon request.
16. The Permittee shall maintain monthly records of the following items:
 - i. The amount of municipal solid waste received (tons/month);
 - ii. The amount of unacceptable waste shipped, the date and the person receiving the unacceptable waste shipped off-site;
 - iii. The total amount of refuse derived fuel (RDF) shipped off-site (tons/months); and

- iv. The total amount of each recyclable stream shipped off-site (tons/month).
17. The facility shall perform routine housekeeping as outlined in Section 9.3.2 of the approved application Log # 2011-149, to control litter. Routine housekeeping measures at a minimum shall include:
- a. inspection and maintenance of the equipment in accordance with the manufacturer's recommendations;
 - b. periodic sweeping and cleaning of tipping floor, process floors, and loading areas.
 - c. daily inspection and cleanup of yard area from spillage, litter, and other foreign materials;
 - d. weekly inspection and cleaning of drainage basins, oil-water separators, sumps, etc.
 - e. monthly fire and safety inspections.
18. The facility shall be maintained and operated to prevent nuisance odors and litter outside the building by drawing air so that all door openings and wall vents will be under negative draft. In addition, Illinois Recycling shall prepare and maintain a community relations plan (CRP) consistent with 35 Ill. Adm. Code Part 1600, Appendix A. The CRP shall include a protocol to provide the public with the opportunity to contact the facility via telephone to report odor complaints related to the facility activities seven (7) days a week, twenty-four (24) hours per day. The protocol shall include a process to provide notice of the complaint call-in information to the public in an identified geographic area. Records of the complaints and any action taken to rectify the cause of the odor shall be made a part of the facility's operating record.
19. Any modification to the facility shall be the subject of an application for supplemental permit for site modification submitted to the Illinois EPA.
20. The Permittee shall submit a new 39(i) certification and supporting documentation within 30 days of any of the following events:
- a. The owner or officer of the owner, or operator, or any employee who has control over operating decisions regarding the facility has violated federal, State, or local laws, regulations, standards, or ordinances in the operation of waste management facilities or sites; or
 - b. The owner or operator or officer of the owner, or operator, or any employee who has control over operating decisions regarding the facility has been convicted in this or another State of any crime which is a felony under the laws of this State, or conviction of a felony in a federal court; or

- c. The owner or operator or officer of the owner, or operator, or any employee who has control over operating decisions regarding this facility has committed an act of gross carelessness or incompetence in handling, storing, processing, transporting, or disposing of waste.
- d. A new person is associated with the owner or operator who can sign the application form(s) or who has control over operating decisions regarding the facility, such as corporate officer or a delegated employee.

The certification shall describe the violation(s), convictions, carelessness or incompetence as outlined in a, b, or c above and must include the date that a new person as described above began employment with the operator. Forms are available at our website @ <http://www.epa.state.il.us/land/regulatory-programs/permits-and-management/forms/index.html#solid-waste-forms>.

The 39i certification and supporting documentation shall be submitted to the address specified below:

Illinois EPA, BOL #33-39i Certification
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

- 21. The Applicant must notify the Agency in writing (i.e., submit an application for an operating permit) that the development of the site has been completed in accordance with 2011-149-DE before a pre-operation site inspection can be conducted or an operating permit issued.

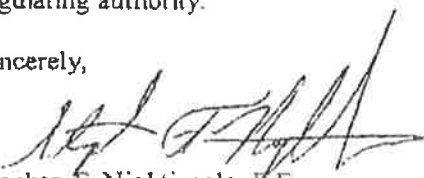
B. CLOSURE PLAN

- 1. The closure plan received by the Illinois EPA on May 11, 2011 is hereby approved in accordance with 35 Ill. Adm. Code, Subtitle G, Part 807.
- 2. The operator shall notify the Illinois EPA within 30 days after receiving the final volume of waste.
- 3. The operator shall initiate implementation of the closure plan within 30 days after the site receives its final volume of waste.
- 4. The operator shall not file any application to modify the closure plan less than 180 days prior to receipt of the final volume of waste.
- 5. Upon completion of closure activities, the operator will notify the Illinois EPA that the site has been closed in accordance with the approved closure plan utilizing the Illinois EPA's "Affidavit for Certification of Completion of Closure of Non Hazardous Waste Facilities."

Within 35 days of the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35 day period for petitioning for a hearing may be extended for a period of time not to exceed ninety days by written notice provided to the Board from the applicant and the Illinois EPA within the 35 day initial appeal period.

Work required by this permit, your application or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This permit does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Sincerely,



Stephen F. Nightingale, P.E.
Manager, Permit Section
Bureau of Land

SFN:MER:0310455284-TRTSTR-2011149-2013587-approval

Cc: Bureau File
Ted Dragovich
Mary Riegle
Desplaines Region